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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON – PORTLAND DIVISION

**CALISTA ENTERPRISES LTD.,**  
a Republic of Seychelles company,

Plaintiff/Counter-defendant,

- v. -

**TENZA TRADING LTD.,**  
a Cyprus company,

Defendant/Counterclaimant.

Case No. 3:13-cv-01045-SI

**CALISTA ENTERPRISES LTD.’S  
OBJECTIONS AND RESPONSES TO  
TENZA TRADING LTD.’S FIRST SET OF  
INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff and Counter-Defendant Calista Enterprises Ltd. (“Calista”), by and through its undersigned counsel, hereby objects and responds to Defendant and Counterclaimant Tenza Trading Ltd.’s (“Tenza”) First Set of Interrogatories to Plaintiff and Counter-Defendant Calista Enterprises Ltd. (“Interrogatories”).

**Val Gurvits | Matthew Shayefar | Boston Law Group, PC**  
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Calista’s Responses to First Set  
of Interrogatories

**INTERROGATORY NO. 11:**

Please describe, in detail, all damages YOU contend you have sustained from unlawful conduct YOU attribute to Tenza, including the nature of the damage, the DATE the damage was sustained, the dollar amount of the damage, and the specific conduct of Tenza that resulted in the damage.

**OBJECTIONS:**

Calista objects to this Interrogatory on the basis that “damages” is ambiguous and undefined. Calista objects to this Interrogatory to the extent that it implies or presumes that Calista ever stated that its damages specifically resulted from “unlawful conduct.” Calista objects to the extent the Interrogatory purports to require Calista to disclose information that is not within Calista’s possession, custody, or control. Calista objects to the Interrogatory to the extent that it calls for a determination of an issue of law.

**RESPONSE:**

Subject to, and without waiving these objections and the General Objections, Calista responds as follows:

Calista suffered a loss of revenues that Calista would have otherwise enjoyed from its participation in Tenza’s PornTube.com Affiliate Program, starting on the date of the filing of the UDRP Complaint and arising out of Tenza’s filing of the UDRP Complaint. Calista suffered further losses as a result of the incurral of legal fees and other expenses related to Tenza’s improper and extra-legal attempt on or about July 16, 2013 to force the registrar for the domains in dispute in the instant litigation to transfer Calista’s Domains, despite the pending litigation before this Court. The value of Calista’s Websites and domain names is also undermined and decreased as the result of Tenza’s actions and Calista will not be able to sell these assets to a

third party because of the cloud cast over them by Tenza. Calista's damages are continuing. Calista will be able to determine the dollar amount of damages pending further discovery.

Calista explicitly reserves the right to supplement its response to this Interrogatory pending further discovery.

**INTERROGATORY NO. 12:**

Please describe, in detail, what YOU understand to be the target demographic for the services and/or products that YOU offer on websites owned, controlled, and managed by YOU, and that include in their URLs the words, "porn" and "tube" in any combination.

**OBJECTIONS:**

Calista objects on the basis that "target" and "demographic" are ambiguous and undefined. Calista objects to the extent that the Interrogatory is overbroad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Calista objects to the extent that it seeks information regarding any website other than the 13 websites at issue in this litigation.


**RESPONSE:**

Subject to, and without waiving these objections and the General Objections, Calista responds that the target demographic for the services and/or products Calista offers on the 13 websites at issue in this litigation are users of the Internet who are legally permitted to access the content on the websites, and that to the best of Calista's knowledge, such users are of all sexes, legal ages, races, ethnicities and religions and that they come from a wide variety of geographical locations.

**INTERROGATORY NO. 13:**

Please describe, in detail, what YOU understand to be the target demographic for the

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, THIS 29th DAY OF OCTOBER, 2013.

  
\_\_\_\_\_  
Alexander Zhukov  
On behalf of Calista Enterprises Ltd.

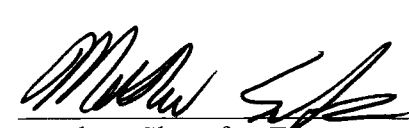
As to all objections:

  
\_\_\_\_\_  
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vgurvits@bostonlawgroup.com  
*Pro Hac Vice*

10/29/13  
Date

**CERTIFICATE OF SERVICE**

**I hereby certify** that a true and correct copy of the foregoing was served electronically via email on all counsel or parties of record on the attached service list this 29th day of October, 2013.

  
\_\_\_\_\_  
Matthew Shayefar, Esq.